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15
16 *Proposed* Bankruptcy Counsel for Debtor and
17 Debtor in Possession

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19 **UNITED STATES BANKRUPTCY COURT**
20 **CENTRAL DISTRICT OF CALIFORNIA**
21 **LOS ANGELES DIVISION**

22 In re:

23 **NEW MEATCO PROVISIONS, LLC,**
24 **d/b/a KING SEAFOOD**

25 Debtor and Debtor in
26 Possession.

Case No. 2:13-bk-22155-PC

Chapter 11

**STIPULATION EXTENDING TIME TO
OBJECT TO NOTICE OF INSIDER
COMPENSATION**

[No Hearing Required]

27 **TO THE HONORABLE PETER CARROLL, UNITED STATES**
28 **BANKRUPTCY JUDGE; THE OFFICE OF THE UNITED STATES TRUSTEE;**
29 **THE DEBTOR'S SECURED LENDERS; THE OFFICIAL COMMITTEE OF**
30 **UNSECURED CREDITORS; AND ALL OTHER PARTIES ENTITLED TO**
31 **NOTICE:**

This Stipulation is entered into between New Meatco Provisions, LLC ("New

1 Meatco”), the Office of the United States Trustee (the “U.S. Trustee”), and the Official
2 Committee of Unsecured Creditors (the “Committee,” and collectively with the Debtor
3 and the U.S. Trustee, the “Parties”), with reference to the following facts and
4 circumstances.

5 **RECITALS**

6 A. On May 8, 2013, New Meatco filed a voluntary petition for relief pursuant
7 to chapter 11 of the Bankruptcy Code.

8 B. On May 24, 2013, New Meatco submitted to the U.S. Trustee its *Notice of*
9 *Setting/Increasing Insider Compensation* with respect to Marc Beilinson (the “Beilinson
10 Notice”) and with respect to Daniel Scouler (the “Scouler Notice”) and served the notices
11 on all required parties.

12 C. The 15 day period to object to the Beilinson Notice and the Scouler Notice
13 was scheduled to expire on June 10, 2013.

14 D. Before the expiration of the objection period, the Committee and the U.S.
15 Trustee raised certain questions regarding the Beilinson Notice and the Scouler Notice.

16 E. To facilitate discussions and permit the Parties time to seek a consensual
17 resolution of any issues that may be raised by the Beilinson Notice and the Scouler
18 Notice, the Parties have agreed to an extension of the relevant objection periods, as set
19 forth herein.

20 **NOW, THEREFORE**, based upon the foregoing, and for good and valuable
21 consideration, the Parties, by and through their respective counsel of record, agree and
22 stipulate as follows.

23 **STIPULATION**

24 1. The deadline for the U.S. Trustee and the Committee to object to the
25 Beilinson Notice is extended through and including June 17, 2013.

26 2. The deadline for the U.S. Trustee and the Committee to object to the
27 Scouler Notice will run concurrently with the objection deadlines with respect to New
28 Meatco’s *Motion for Order Authorizing and Approving the Debtor’s Engagement of*

1 *Daniel Scouler as Its Chief Restructuring Officer and the Employment of Scouler &*
2 *Company LLC Effective as of May 8, 2013, which the Parties anticipate will be filed*
3 *substantially contemporaneously with this Stipulation.*

4
5 DATED: June 10, 2013

ARENT FOX LLP

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7 By: /s/ Mette H. Kurth
8 Mette H. Kurth
9 *Proposed* Bankruptcy Counsel to Debtor
and Debtor-in-Possession

10 DATED: June __, 2013

STUTMAN. TREISTER & GLATT P.C.

11
12 By: _____
13 Eve H. Karasik
14 *Proposed* Counsel to the Official
Committee of Unsecured Creditors

15 DATED: June __, 2013

**OFFICE OF THE UNITED STATES
TRUSTEE**

16
17 By: _____
18 Kenneth G. Lau
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9 *Proposed* Bankruptcy Counsel to Debtor
10 and Debtor-in-Possession

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12 DATED: June 11, 2013

STUTMAN, TREISTER & GLATT P.C.

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14 Eve H. Karasik
15 *Proposed* Counsel to the Official
16 Committee of Unsecured Creditors

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**OFFICE OF THE UNITED STATES
TRUSTEE**

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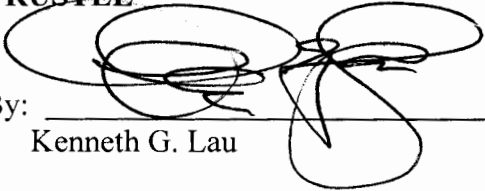
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10 DATED: June __, 2013

STUTMAN. TREISTER & GLATT P.C.

11 By: _____
12 Eve H. Karasik
13 *Proposed* Counsel to the Official
Committee of Unsecured Creditors

14
15 DATED: June 10, 2013

**OFFICE OF THE UNITED STATES
TRUSTEE**

16
17 By:  _____
18 Kenneth G. Lau

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
Arent Fox LLP, Gas Company Tower, 555 West Fifth Street, 48th Floor, Los Angeles, CA 90013

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION EXTENDING TIME TO OBJECT TO NOTICE OF INSIDER COMPENSATION** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **June 11, 2013**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On (*date*) **June 11, 2013**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 11, 2013

Date

ADRIANE I. LARK

Printed Name

/s/ Adriane I. Lark

Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Craig H Averch on behalf of Interested Party Wilmington Trust, National Association, as Administrative Agent under that certain Second Lien Senior Secured Loan and Guaranty Agreement, dated as of April 18, 2011
caverch@whitecase.com

Bernard D Bollinger, Jr on behalf of Creditor Wells Fargo Bank, N.A.
bbollinger@buchalter.com, IFS_filing@buchalter.com;smartin@buchalter.com

J Scott Bovitz on behalf of Creditor Boyle Avenue Properties
bovitz@bovitz-spitzer.com

William S Brody on behalf of Interested Party Courtesy NEF
wbrody@buchalter.com, rreeder@buchalter.com;IFS_filing@buchalter.com

Bernard R Given on behalf of Creditor Intercarnes Texas Corporation
bgiven@loeb.com, mortiz@loeb.com

Gregory K Jones on behalf of Creditor Committee Official Committee Of Unsecured Creditors
gjones@stutman.com

Sheri Kanesaka on behalf of Creditor Viz Cattle Corporation
skanesaka@alvaradosmith.com, crosas@alvaradosmith.com

Mette H Kurth on behalf of Debtor New Meatco Provisions, LLC
kurth.mette@arentfox.com

Mary D Lane on behalf of Interested Party Courtesy NEF
mal@msk.com, mec@msk.com

Kenneth G Lau on behalf of U.S. Trustee United States Trustee (LA)
kenneth.g.lau@usdoj.gov

Craig G Margulies on behalf of Creditor Monarch Trading LLC
craig@marguliesfaithlaw.com,
staci@marguliesfaithlaw.com;denisse@marguliesfaithlaw.com;fahim@marguliesfaithlaw.com

Craig G Margulies on behalf of Interested Party Courtesy NEF
craig@marguliesfaithlaw.com,
staci@marguliesfaithlaw.com;denisse@marguliesfaithlaw.com;fahim@marguliesfaithlaw.com

James A McCullough on behalf of Interested Party Courtesy NEF
jmccullough@brunini.com, mallen@brunini.com;vwycoff@brunini.com

Scott H Olson on behalf of Creditor ML Long Beach, LLC
solson@seyfarth.com

United States Trustee (LA)
ustpreion16.la.ecf@usdoj.gov

2. SERVED BY UNITED STATES MAIL:

Judge

Honorable Peter H. Carroll, Chief Judge
United States Bankruptcy Court
Central District of California
Edward R. Roybal Federal Building
255 E. Temple Street
Suite 1460 / Courtroom 1468
Los Angeles, CA 90012

U.S. Trustee

Kenneth G. Lau
United States Trustee (LA)
725 S Figueroa St., 26th Floor
Suite 2600
Los Angeles, CA 90017

**Attorneys for
Official Committee of Unsecured Creditors**

Gregory K Jones
Eve H. Karasik
Gary E. Klausner
Stutman, Treister & Glatt PC
1901 Avenue of the Stars, 12th Floor
Los Angeles, CA 90067